

EXHIBIT G

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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RICHARD KADREY, et al.,

Individual and

Representative Plaintiffs,

vs.

Case No.

META PLATFORMS, INC., a

3:23-cv-03417-VC

Delaware corporation,

Defendant.

-----x

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF

CHRISTOPHER GOLDEN

Boston, Massachusetts

Reported by:

MaryJo O'Connor, RDR, RMR

Job No: 6917590

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1 concept of your art having an impact on 11:15:14
2 society. Where does that rank for you in terms 11:15:16
3 of importance? 11:15:20

4 MR. ZIRPOLI: Object to the form 11:15:22
5 of the question. 11:15:23

6 A. I take seriously the concepts of 11:15:23
7 good and evil. And to that end, I want to 11:15:43
8 entertain people, but hopefully do it in a way 11:15:50
9 that is communicating the ideas of what good 11:15:54
10 and evil are. 11:15:59

11 Q. Do you believe that your writings 11:16:00
12 espouse that view; that you want to write about 11:16:05
13 concepts of good and evil? 11:16:10

14 A. I would think so. 11:16:12

15 Q. Do you believe that in so doing, 11:16:13
16 you are impacting society? 11:16:16

17 A. I have no idea. 11:16:18

18 Q. When you wrote Snowblind, Ararat, 11:16:20
19 Dead Ringers and The Pandora Room, did you 11:16:29
20 think that any of them would be used to teach 11:16:33
21 language to an AI Large Language Model? 11:16:36

22 A. Certainly not. 11:16:40

23 Q. Didn't cross your mind? 11:16:40

24 A. No. 11:16:43

25 Q. That certainly wasn't a motivation 11:16:43

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1 for you writing the books? 11:16:45

2 A. Certainly not. 11:16:46

3 Q. I didn't ask you this. Are any of 11:16:48

4 the books that you've published adaptations of 11:16:53

5 earlier books? 11:16:59

6 A. No. But I had the basic concept 11:17:00

7 of The Pandora Room was developed at a time 11:17:10

8 when I was going to do it as a Hellboy novel. 11:17:13

9 Hellboy, being a comic book series created and 11:17:17

10 own by my friend and collaborator Mike Mignola. 11:17:22

11 Didn't end up writing it that way. 11:17:26

12 Eventually I was asked to do a 11:17:30

13 short story for an anthology called, I think, 11:17:32

14 The Library of the Dead. And I wrote a short 11:17:37

15 story with my friend Tim Levin called Fault 11:17:41

16 Lines that does include the same concept of the 11:17:45

17 two jars. I think that's what we did. 11:17:50

18 When it came time to do The 11:17:56

19 Pandora Room, I relied on my original pitch for 11:17:57

20 the idea that I was going to originally do as a 11:18:02

21 Hellboy novel. And that's the story of that. 11:18:05

22 Q. Had you assigned your rights to 11:18:12

23 the earlier treatment that involved the two 11:18:14

24 jars to anybody else? 11:18:17

25 A. No. 11:18:18

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C E R T I F I C A T E

I, MaryJo O'Connor, a Notary Public
in and for the Commonwealth of
Massachusetts, do hereby certify:

That CHRISTOPHER GOLDEN, the
witness whose testimony is hereinbefore set
forth, was duly sworn by me and that such
testimony is a true and accurate record of
my stenotype notes taken in the foregoing
matter to the best of my knowledge, skill
and ability.

IN WITNESS WHEREOF, I have hereunto
set my hand and Notarial Seal this 30th day
of September 2024.



MARYJO O'CONNOR, RDR/RMR
Notary Public

My Commission expires:
September 12, 2025

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, ET AL)

Plaintiffs) Case No.: 3:23-cv-03417-VC

Vs.)

META PLATFORMS, INC.,)

A Delaware Corporation)

Defendant)

Deposition of LAURA LIPPMAN, was taken
via videotape on Tuesday, September 17, 2024,
commencing at 9:32 a.m., at Kramon & Graham, P.A.,
750 East Pratt Street, Suite 1100, Baltimore,
Maryland, before MICHELE D. LAMBIE, Notary Public.

Reported By:

Michele D. Lambie, CSR-RPR

1 that has yet to be established, because when 05:59:53
2 copyrighted work is taken without permission or 05:59:58
3 compensation, we don't know yet what the market is. 06:00:01
4 I mean ... 06:00:06

5 BY MS. DUNNING: 06:00:09

6 Q. When you wrote your six books, did you 06:00:09
7 have any intention of licensing those books to 06:00:15
8 anyone for AI training? 06:00:20

9 MR. SWEATMAN: Object to form. 06:00:22

10 THE WITNESS: The six books in the class 06:00:23
11 were written before I knew that AI training 06:00:30
12 existed. 06:00:32

13 BY MS. DUNNING: 06:00:33

14 Q. Okay. And so when you wrote those books, 06:00:33
15 was one of the purposes in writing them so that 06:00:37
16 they could be used to train a generative artificial 06:00:41
17 intelligence model? 06:00:45

18 A. I don't -- 06:00:47

19 MR. SWEATMAN: Object to form. 06:00:47

20 THE WITNESS: I don't see how I could 06:00:47
21 have the intention to do something that wasn't yet 06:00:49

1 possible according to my knowledge. 06:00:51

2 BY MS. DUNNING: 06:00:53

3 Q. Okay. So you did not have that intention 06:00:53

4 at the time you wrote the books? 06:00:55

5 MR. SWEATMAN: Object to form. 06:00:58

6 THE WITNESS: That was not my intention. 06:00:58

7 BY MS. DUNNING: 06:01:01

8 Q. And it was not your purpose in 06:01:01

9 writing -- let me ask it again. 06:01:06

10 It wasn't a purpose in your writing those 06:01:08

11 six books that they be used to train an AI model, 06:01:13

12 right? 06:01:18

13 MR. SWEATMAN: Object to form. 06:01:18

14 THE WITNESS: That was not my intent or 06:01:19

15 my purpose. 06:01:22

16 BY MS. DUNNING: 06:01:22

17 Q. You've already testified that you 06:01:22

18 personally, to the best of your knowledge, have not 06:01:34

19 used any Meta LLM, correct? 06:01:37

20 A. To the best of my knowledge, I have not. 06:01:41

21 MR. SWEATMAN: Object to form. 06:01:44

1 State of Maryland

2 County of Baltimore, to wit:

3 I, Michele D. Lambie, a Notary Public of
4 the State of Maryland, County of Baltimore, do
5 hereby certify that the within-named witness
6 personally appeared before me at the time and place
7 herein set out, and after having been duly sworn by
8 me, according to law, was examined by counsel.

9 I further certify that the examination
10 was recorded stenographically by me and this
11 transcript is a true record of the proceedings.

12 I further certify that I am not of
13 counsel to any of the parties, nor related to any
14 of the parties, nor in any way interested in the
15 outcome of this action.

16 As witness my hand and notarial seal this
17 2nd day of October 2024.

18
19 
20
21

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

- - - - -
RICHARD KADREY, et al, |
Plaintiffs, | Case Number:
vs. | 3:23-cv-03417-VC
META PLATFORMS, INC., a |
Delaware corporation, |
Defendant. |
- - - - -

Confidential Videotaped Deposition of
RACHEL LOUISE SNYDER
Wednesday, December 11, 2024
at 9:42 a.m.
in Washington, D.C.

Reported by:
Laurie Donovan, RPR, CRR, CLR
JOB 7030288

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1 it was designed to be helpful, is, is that not a, a
2 purpose and use case that could support the learning
3 and development that you try to foster in your
4 students?

5 A That scenario that you described is so far
6 from the realm of any high school student that I know,
7 like they're not going, oh, AI, okay, thank you, this
8 is a really good introduction. I'm going to go walk
9 and do my research now. Like they don't do that.

10 What they do is they say, hey, you know
11 what? I want to go to the Taylor Swift concert. I
12 got to get this paper off my desk as soon as possible,
13 and they, you know, they have the lowest input, even
14 the really good students. Like I'm not just talking
15 about the losers like I was in high school.

16 I mean students who are getting As and Bs
17 and mostly As are using AI, and they're using it
18 across the board. They're not using it as like a step
19 into deeper research. Like maybe grad students do
20 that, maybe, but even grad students, I would bet, who
21 are like under the gun or under pressure are -- you
22 know, they're just -- it's just tempting to take a
23 shortcut, and easy.

24 Q When you wrote No Visible Bruises, did you
25 ever think it would be used to teach language to an AI

1 model?

2 A AI hadn't even been invented, so far as I'm
3 aware. No. I certainly never thought that, no.

4 Q So write -- you did not write No Visible
5 Bruises so that it could be used to teach an AI model,
6 right?

7 A No.

8 Q That wasn't any part of the motivation for
9 you to write your book?

10 A No.

11 Q Would you say you have a loyal fan base?

12 A No.

13 Q Are there people, given your journalism over
14 the years, that you believe, you know, trust and
15 respect your writing as a source of, you know,
16 well-researched, you know, truth?

17 A I hope so. I mean maybe. I don't know.

18 MS. DUNNING: We've been going about an
19 hour. Should we take just a five-minute break?

20 MR. RATHUR: I'm okay to keep going, but
21 I'll defer to Rachel.

22 MS. DUNNING: I want to make sure our court
23 reporter doesn't need a break.

24 THE REPORTER: I need a little break.

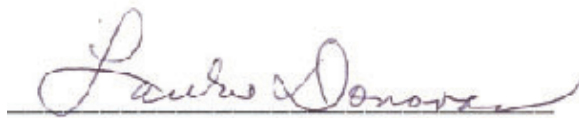
25 MR. RATHUR: We can go off the record.

CERTIFICATE OF SHORTHAND REPORTER -- NOTARY PUBLIC

I, Laurie Donovan, Registered Professional Reporter, Certified Realtime Reporter, and notary public for the District of Columbia, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 24th day of December 2024.

My commission expires: July 14, 2027

A handwritten signature in purple ink, reading "Laurie Donovan", is written over a horizontal line.

LAURIE DONOVAN

NOTARY PUBLIC IN AND FOR
THE DISTRICT OF COLUMBIA